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THE UNIVERSITY OF ALABAMA SYSTEM

THE UNIVERSITY OF ALABAMA • THE UNIVERSITY OF ALABAMA AT BIRMINGHAM • THE UNIVERSITY OF ALABAMA IN HUNTSVILLE

Charles M. Anderson

Vice Chancellor for Information Technology and Outreach

February 11, 2000

Ms. Magalie Roman Salas
Office of the Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554

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Re: WT Docket No. 97-207: Calling Party Pays Service Offering in
the Commercial Mobile Radio Services

Dear Ms. Salas:

As a member of ACUTA: the Association of Telecommunications Professionals in Higher Education, the three institutions in the University of Alabama System - The University of Alabama, The University of Alabama at Birmingham and the University of Alabama in Huntsville have closely followed the Calling Party Pays ("CPP") rulemaking proceeding and strongly supports the positions expressed in ACUTA's comments. Like many ACUTA members, we are a non-profit educational institution deeply concerned that without appropriate safeguards, CPP will expose our three institutions to significant financial liability that would undermine our ongoing effort to provide educational services.

The University of Alabama System currently has an enrollment of over 40,000 students and thousands of fulltime and part-time faculty and staff. With an extensive telecommunications infrastructure accessible to such a large number of student and employee users, we face the very real threat of uncontrollable, unauthorized CPP calls.

Currently, students and employees place telephone calls from extensions in campus buildings that are routed through a centralized PBX controlled by the three telecommunications departments. Our existing PBXs can easily be programmed to block, or track call detail for, a variety of calls, such as toll ("1+") calls and calls to pay-per-call services (i.e., calls to "900" numbers), based on the unique numbering schemes associated with these types of calls. For example, when a student places a long distance call from his/her dormitory room, the PBX recognizes the 1+ dialing pattern and knows to request an authorization code before completing the call. This process enables our telecommunications department to bill the individual caller for his/her toll charges. If a new type of toll call is introduced (in the form of a CPP service) that does not use the same type of numbering scheme as toll calls under the North American Numbering Plan, our PBX will be unable to identify the call and request the authorization code we need to bill the toll to the cost-causing party.

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We agree that verbal notification to calling parties is a critical prerequisite to the implementation of CPP in a way that protects consumers. But this kind of notification by itself would not protect our institutions from unauthorized CPP calls. A student or employee can hear the notification, but the institution will never be able to bill that student or employee for his/her charges. Without some means to screen and block calls, it will take very little time for our campus population to learn that "free" calls can be made to CPP numbers, the cost of which will ultimately be borne by our institutions. Even a small percentage of calls made to CPP numbers would have a direct and immediate impact on our already constrained budget.

We understand that the record before the Commission reflects a range of views on how large institutions might control the level of unauthorized CPP calls. We have considered the many options available and have consistently supported the numbering solution advocated by ACUTA in its written comments and oral presentations in this proceeding. The most efficient, cost-effective, and administratively simple way to deal with the problem of unauthorized CPP calls is by assigning one or more identifiable Service Access Codes ("SACs") to CPP numbers. With very little effort, and at almost no cost, our PBXs could be programmed to recognize the designated CPP SAC(s) in exactly the same way that they are programmed to recognize the numbering patterns of other chargeable calls. The SAC solution would also save our institution the considerable expense and disruption of replacing the PBXs we have in use with costly, next-generation equipment that could distinguish CPP calls without identifiable numbering.

As a non-profit higher education system of three institutions, we are always concerned when we face the prospect of uncertain or uncontrollable external costs. On our campuses, wireless telephones have become increasingly popular, particularly with students. Thus, our concern about the likelihood of unrecoverable costs associated with CPP calls is well placed. Given the re-allocation of financial responsibility caused by CPP, the importance of enabling subscribers to block, or track, CPP calls is undeniable. The Commission would best serve the public interest -- and accommodate the needs of educational institutions such as ours -- by assigning a unique SAC to all CPP numbers. We appreciate the opportunity to offer the Commission our views on this matter, and we look forward to the successful implementation of CPP in a manner that will take into account the needs of all affected parties.

Sincerely,

A handwritten signature in black ink, appearing to read 'C. M. Anderson', written over a horizontal line.

Charles M. Anderson

Vice Chancellor for Information Technology and Outreach